

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEBRASKA

UNITED STATES OF AMERICA,

Plaintiff,

vs.

\$4,698,514.00 in United States Currency, et
al.,

Defendants.

8:24CV160

**NOTICE OF COMPLAINT
FOR FORFEITURE *IN REM***

TO: Property Owner/Known Potential Claimant
Sent via U.S. Mail and/or Certified Mail

1. DATE OF NOTICE: May 3, 2024.
2. FORFEITURE COMPLAINT: On May 3, 2024, the United States of America filed a civil Complaint in the United States District Court for the District of Nebraska seeking forfeiture *in rem* against the Defendants' property pursuant to 21 U.S.C. § 881.
3. FILING A VERIFIED CLAIM: Because the United States is serving you with this Notice *via* U.S. Mail, if you have an ownership interest in the Defendant property that you wish to assert, you must file a Verified Claim within ***thirty-five days*** after the date of this Notice as required by Rule G(4)(b), Supplemental Rules for Admiralty or Maritime Claims and Asset Forfeiture Actions. If you fail to file a timely Verified Claim as required by Rule G(4), the United States will seek forfeiture of the Defendants' property.
4. CONTENTS OF VERIFIED CLAIM: Pursuant to Rule G(5)(a), a Verified Claim must: (A) identify the specific property claimed, (B) identify the claimant and state the claimant's interest in the property and (C) be signed by the claimant under penalty of perjury. *See also* 28 U.S.C. § 1746. If the Verified Claim is made on behalf of the person entitled to possession by

an agent, bailee or attorney, it must state that the agent, bailee, or attorney is duly authorized to make the Verified Claim.

5. FILING AN ANSWER: Pursuant to Rule G(5)(b), if you file a Verified Claim, you must then **also** file an Answer to the Complaint, or a motion as provided by Rule 12 of the Federal Rules of Civil Procedure, within *twenty-one days* after filing the Verified Claim.

6. FILING WITH COURT AND SERVICE ON UNITED STATES: The Verified Claim and the Answer must be filed with the Office of the Clerk, United States District Court for the District of Nebraska, 111 South 18th Plaza, Suite 1152, Omaha, Nebraska 68102, and a copy of the Verified Claim and the Answer must be sent to Kimberly C. Bunjer, Assistant United States Attorney, 1620 Dodge Street, Suite 1400, Omaha, Nebraska 68102.

7. ADDITIONAL INFORMATION: Please see 18 U.S.C. § 983, 28 C.F.R. Part 9, and Rule G of the Supplemental Rules for Admiralty or Maritime Claims and Asset Forfeiture Actions for additional procedures and regulations regarding this forfeiture action.

PLEASE ALSO NOTE: Failure to follow the rules, regulations and requirements outlined above may result in judgment by default in favor of the United States in this action. You may wish to seek legal advice to protect your interests.

UNITED STATES OF AMERICA,
Plaintiff

SUSAN T. LEHR
United States Attorney

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